

# **APPENDIX A**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

ADVANCED MEMORY TECHNOLOGIES,  
LLC,

Plaintiff,

v.

SK HYNIX INC.,

Defendant.

Case No. 2:24-CV-1078-JRG-RSP

**JURY TRIAL DEMANDED**

**REQUEST FOR INTERNATIONAL JUDICIAL ASSISTANCE (JAPAN)**

In conformity with Article 5 of the Vienna Convention on Consular Relations, Federal Rules of Civil Procedure 26(b)(1) and 28(b)(1), 28 U.S.C. § 1651, and 28 U.S.C. § 1781(b), the undersigned judicial authority has the honor to submit this request on behalf of Defendant SK hynix Inc. (“SK hynix”) in the above-captioned action.

The United States District Court for the Eastern District of Texas, by and through the Honorable Judge J. Rodney Gilstrap, United States District Court Judge, presents its compliments to the judicial authorities of Japan, and requests international judicial assistance to obtain evidence to be used in a civil proceeding before this court in the above-captioned matter.

This court requests the assistance of the Courts of Japan to compel Seiko Instruments Inc. (“Seiko”), a Japanese corporation, to provide the requested documentary and testimony evidence to the appropriate authority designated by the judicial authorities of Japan for this purpose.

This court requests the assistance described herein as necessary in the interests of justice. Below are the names of, and contact information for, all parties and their respective legal representatives:

Party	Legal Representatives
<b>PLAINTIFF:</b> Advanced Memory Technologies, LLC c/o legal representatives	<p>Justin A. Nelson Texas State Bar No. 24034766 SUSMAN GODFREY LLP 1000 Louisiana Street, Suite 5100 Houston, Texas 77002 Telephone: (713) 651-9366 Facsimile: (713) 654-6666 jnelson@susmangodfrey.com</p> <p>Kalpana Srinivasan California State Bar No. 237460 SUSMAN GODFREY LLP 1900 Avenue of the Stars, Suite 1400 Los Angeles, CA 90067 Telephone: (310) 789-3100 Facsimile: (310) 789-3150 ksrinivasan@susmangodfrey.com</p> <p>Ian Gore Washington State Bar No. 54519 SUSMAN GODFREY LLP 401 Union Street, Suite 3000 Seattle, Washington 98101 Telephone: (206) 516-3880 Facsimile: (206) 516-3883 igore@susmangodfrey.com</p> <p>Kemper Diehl Washington State Bar No. 53212 SUSMAN GODFREY LLP 401 Union Street, Suite 3000 Seattle, Washington 98101 Telephone: (206) 516-3880 Facsimile: (206) 516-3883 kdiehl@susmangodfrey.com</p> <p>Bianca Rey Washington State Bar No. 62422 SUSMAN GODFREY LLP 401 Union Street, Suite 3000 Seattle, Washington 98101 Telephone: (206) 516-3880</p>

Party	Legal Representatives
	<p data-bbox="826 317 1170 384">Facsimile: (206) 516-3883 brey@susmangodfrey.com</p> <p data-bbox="826 426 1260 714">Ravi Bhalla New York State Bar No. 5748223 SUSMAN GODFREY LLP One Manhattan West, 50th Floor New York, NY 10001 Telephone: (212) 336-8330 Facsimile: (212) 336-8340 rbhalla@susmangodfrey.com</p> <p data-bbox="826 756 1260 1043">Andrew Nassar New York State Bar No. 6162226 SUSMAN GODFREY LLP One Manhattan West, 50th Floor New York, NY 10001 Telephone: (212) 336-8330 Facsimile: (212) 336-8340 anassar@susmangodfrey.com</p> <p data-bbox="826 1085 980 1117"><i>Of Counsel:</i></p> <p data-bbox="826 1159 1230 1446">Claire Abernathy Henry Texas State Bar No. 24053063 MILLER FAIR HENRY PLLC 1507 Bill Owens Parkway Longview, TX 75604 Telephone: (903) 757-6400 Fax: (903) 757-2323 claire@millerfairhenry.com</p> <p data-bbox="826 1488 1230 1776">Andrea Fair Texas State Bar No. 24078488 MILLER FAIR HENRY PLLC 1507 Bill Owens Parkway Longview, TX 75604 Telephone: (903) 757-6400 Fax: (903) 757-2323 andrea@millerfairhenry.com</p>

Party	Legal Representatives
<b>DEFENDANT:</b> SK hynix Inc. c/o legal representatives	<p>Sean Pak (CA Bar No. 219032) QUINN EMANUEL URQUHART &amp; SULLIVAN, LLP 50 California Street, 22nd Floor San Francisco, California 94111-4788 Telephone: (415) 875-6600 Fax: (415) 875-6700 Email: seanpak@quinnemanuel.com</p> <p>Andrew M. Holmes (CA Bar No. 260475) QUINN EMANUEL URQUHART &amp; SULLIVAN, LLP 50 California Street, 22nd Floor San Francisco, California 94111-4788 Telephone: (415) 875-6600 Fax: (415) 875-6700 Email: drewholmes@quinnemanuel.com</p> <p>Kevin Jang (CA Bar No. 337747) QUINN EMANUEL URQUHART &amp; SULLIVAN, LLP 50 California Street, 22nd Floor San Francisco, California 94111-4788 Telephone: (415) 875-6600 Fax: (415) 875-6700 Email: kevinjang@quinnemanuel.com</p> <p>D. James Pak (CA Bar No. 194331) QUINN EMANUEL URQUHART &amp; SULLIVAN, LLP 865 S. Figueroa St, 10th Floor Los Angeles, CA 90017 Telephone: (213) 443-3100 Fax: (213) 443-3000 Email: djamespak@quinnemanuel.com</p> <p>Richard Erwine (NY Bar No. 2753929) QUINN EMANUEL URQUHART &amp; SULLIVAN, LLP 295 5th Avenue, 7th Floor New York, New York 10016 Telephone: (212) 849-7000</p>

Party	Legal Representatives
	<p>Fax: (212) 849-7100 Email: richarderwine@quinnemanuel.com</p> <p>Deron R. Dacus Texas Bar No. 00790553 THE DACUS FIRM, P.C. 821 ESE Loop 323, Suite 430 Tyler, Texas 75701 Telephone: 903-705-1117 Fax: (903) 581-2543 Email: ddacus@dacusfirm.com</p>

**REPRESENTATIVE TO ACT AS CONTACT:**

Should correspondence in this matter be required, contact should be made through the following individuals:

Kevin Jang  
QUINN EMANUEL URQUHART & SULLIVAN, LLP  
50 California Street, 22nd Floor  
San Francisco, California 94111-4788  
Telephone: (415) 875-6600  
Fax: (415) 875-6700  
Email: kevinjang@quinnemanuel.com

**ENTITY FROM WHOM EVIDENCE IS REQUIRED:**

Seiko Instruments Inc.  
8, Nakase 1-chome, Mihama-ku, Chiba-shi, Chiba 261-8507, Japan

It has been represented to this court that Seiko Instruments Inc. is a corporation registered under the laws of Japan.

**SUBJECT MATTER AND RELATIVITY OF THIS REQUEST:**

It has been represented to this court that this request is made in connection with Case No. 2:23-cv-274-JRG-RSP, in which Plaintiff Advanced Memory Technologies, LLC (“AMT”)

contends that Defendant SK hynix infringed five AMT patents, including U.S. Patent Nos. 7,777,557 (the “’557 patent”), 7,920,018 (the “’018 patent”), 7,969,231 (the “’231 patent”), 8,593,888 (the “’888 patent”), and 8,400,835 (the “’835 patent”) (collectively, “the Asserted Patents). In defense against AMT’s claims, SK hynix asserts, *inter alia*, that it does not infringe any of the Asserted Patents and that the Asserted Patents are invalid.

In order to present that the Asserted Patents are invalid and unenforceable, SK hynix seeks certain documents and testimony from Seiko for use at trial relevant to their products, including the S-24C02BMFN 2K EEPROM product, that existed at the time of the invention for the Asserted Patents. Attached as **Exhibit A** is a request for production of certain documents for use at trial that SK hynix believes are likely to be in the possession, custody, or control of Seiko. To further clarify the evidence sought for use at trial, attached as **Exhibit B** is an outline of the topics and issues about which counsel for SK hynix intend to inquire of Seiko.

In view of the foregoing, it is therefore requested, in the interest of justice, that the appropriate judicial authority of Japan issue an order, in accordance with the laws and procedures of the Courts of Japan, summoning Seiko to appear before the designated authority to provide the documentary evidence and testimony as requested by the below-signed judicial authority.

When required, the below-signed judicial authority shall provide reciprocal assistance, such as requested herein, to the appropriate judicial authorities of Japan.

SK hynix’s legal representatives at Quinn Emanuel Urquhart & Sullivan, LLP (contact information listed above), stand ready and willing to reimburse the appropriate judicial authorities in Japan, for all costs incurred in executing the below-signed judicial authority’s request for international judicial assistance.

WITNESS, the Honorable Judge J. Rodney Gilstrap, Judge of the United States District Court for the Eastern District of Texas, this \_\_\_\_\_ day of \_\_\_\_\_, 2025.

Signature and Seal of Requesting Authority:

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Hon. J. Rodney Gilstrap  
United State District Court  
Eastern District of Texas